

PSJ9 Exh 47

Gary Thalacker

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Sent: Thu 5/07/2009 11:43 AM (GMT-04:00)
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Subject: CSOMP

All,

In an effort to improve our CSOMP program to identify true suspicious orders and provide legitimate amounts of product to our customers we are making a change in information requested.

If a customer shows up in CSOMP as suspended, we will email you to let you know. We will also request additional information for you to have the customer provide. This information may include all dispensing data, but in most cases we will request information just on the product family suspended. We may also request additional information as to the types of customers the pharmacy is servicing, such as are they adjacent to a hospital, do they service local pain clinics or service long term care facilities, etc. We will need names and locations of these facilities. Prior to entertaining the raising of a URL, we will need all documentation supporting the raising of the URL.

In some cases we will release the suspended order or cancel the order. In most cases the customer will not be reported to DEA as suspicious, except in extreme cases. We will give the division ten (10) days to provide the requested information. After our review we will notify the division of our findings. If documented justification is provided, we will raise the URL to accommodate legitimate purchases plus a buffer to account for some increased sales. It will be important for the customer to notify us of changes in their business that would dictate a need for more controlled product. Documentation will be required for any increases.

We are working to be more open with our customers as to what their purchasing levels will be for certain controlled substances on a monthly basis. We are enhancing the system to provide a static URL that we can provide our customers on products they need that exceed the average URL. As stated above, we want to identify true suspicious orders that indicate diversion. Customers that continue to show up in the CSOMP program after we implement these enhancements, will be subject to further scrutiny to determine if we should be servicing the customer at all.

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